

Exhibit F

Declaration of Patricia A. Walker

1. I am an attorney of record for the Defendants Ann Galvan and Gloria Galvan in this lawsuit. I am an adult and I have personal knowledge of the facts in this Declaration.
2. On March 1, 2016 the Plaintiff's counsel indicated that Count 10 (State Statutory Identity Fraud) and Count 11 (State Common Law Impersonation) were going to be dismissed. However, when the discovery cut off got close in September, 2016 the Plaintiff's counsel indicated that those claims would be tried to the jury.
3. When Plaintiff's counsel was asked about this change of mind in September, 2016, Plaintiff's counsel suggested that the dismissal was offered in exchange for the Defendants withdrawing the Motion to Compel (the Defendants did not withdraw the Motion to Compel). However, that was not my understanding of the promised March dismissal of Counts 10 and 11.
4. The Defendants were forced to schedule depositions in Iowa for October 26 and 27, 2016. Plaintiff's attorneys received copies of the Subpoenas for the Iowa depositions. Only after receiving notice of the depositions in Iowa did Plaintiff decide that it really might dismiss the identity fraud and impersonation Counts in the Amended Complaint. The motion to dismiss those claims was filed on October 20, 2016.
5. The identity fraud and impersonation claims arose between March 4, 2011, the date of the settlement of the first lawsuit between the parties, and June 10, 2011, when the Sigler Companies filed the litigation against TSDC, LLC in the Trademark Office.
6. The Defendants incurred costs for defending against the identity fraud and impersonation Counts, setting up the depositions, sending out the Subpoenas, obtaining a place for the

depositions and cancelling the depositions. Exhibit F1 is the letter sending \$305 for the witness fees. Exhibit F2 is the invoice from the process server in the amount of \$90.07.

7. Defendants' counsel spent at least five hours defending against the claims and arranging and cancelling the depositions. At \$250 per hour, the total cost was \$1,250. Therefore, the total spent on these claims was at least \$1,645.07.

8. Due to the hesitation of the Plaintiffs to prosecute the claims and the actions which forced the Defendants to defend against the claims at the last minute, Defendants request that equitable principles be applied and the claims be dismissed with prejudice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 27, 2016


Patricia A. Walker

Exhibit F1

Patricia A. Walker
Trademark Law

Walker
&
Jocke Co., LPA

October 17, 2016
Via U.S. Mail

Angelina M. Thomas
Attorney at Law
Newbrough Law Firm, LLP
612 Kellogg Ave., Box 847
Ames, IA 50010

Dear Ms. Thomas:

Enclosed please find Walker & Jocke's Check No. 4908 in the amount of \$305 for service of the following subpoenas:

- \$75 for each subpoena for Sigler Companies, Sigler Marketing, and Janni Jensen.
- \$80 for the subpoena to Glenda Elliott.

Thank you for your assistance in this matter.

Respectfully,
Pat

Patricia A. Walker

jl
Enclosure

231 South Broadway, Medina, Ohio USA 44256-2601

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Facsimile

rej@walkerandjocke.com
E-Mail

Exhibit F2

Iowa Division Investigations

To: Walker & Jocke Co., LPA

RE: Process Service- TSDC, LLC et al. v Ann Galvan, et al
10/20/2016

1:14-cv-02699-DCN

IDI Case # 16-564

Name/Date	Address	Activity	Fee
R.McMillen 10/17/16	Sigler Co-3100 S. Riverside Dr., Ames, IA	Served	\$50.00
J.Jensen 10/17/16	1601 Golden Aspen Dr, Ames, IA	Business no longer there	
J.Jensen 10/18/16	12605 Oakview Circle, Story City, IA	No Answer	
		26.2 miles @ .54	\$14.15
G.Elliott 10/18/16	225 Juliana Ct, Polk City, IA	No Answer	
		48 miles @ .54	\$25.92

Subtotal: \$90.07

Miscellaneous
Expenses Cost

Total \$0.00

Summary Totals

Service fees: \$50.00
Mileage fees: \$40.07

Balance 10/20/16 \$90.07

Thank you!

Please remit to: Iowa Division Investigations, Inc.
P.O. Box 1456
Ames, IA 50014
FI#83-0437463